Chemical Labeling, Storage and Inventory Updates

The Chemical Hygiene and Safety Plan was updated to clarify the Lab's chemical labeling and storage requirements. Our chemical inventory requirements were also revised. These changes were developed with the input and endorsement from the LBNL scientific community and are summarized below. You may click on the corresponding links for more details:

<u>Labeling containers</u>: Chemical containers used in non-research lab areas such as shops need to be labeled with the name of the chemical and its hazards. This rule has not changed. However, in research laboratories, only the name of the chemical is required. These changes were made to be consistent with the OSHA regulations that apply to different occupational settings.

<u>Labeling small containers</u>: Containers such as vials, may be too small to label in the manner described above. Alternatives such as labeling a tray or rack used to contain them, or applying a numbering or coding system, are permissible provided that the material's identity is readily accessible (e.g., by means of a lab notebook) to personnel and that they understand the system.

<u>Labeling Pre-packaged Kits Containing Individual Containers:</u> Kits containing individual containers of hazardous materials are often used in both laboratory and non-laboratory work areas. Individual containers require no additional labeling when separated from a kit.

Storage: The storage section was updated to clarify what is required and what is recommended. Requirements are either mandated by external regulations or by Lab's policy. Whereas recommendations are good work practices that enhance or promote safety; but not following them is not a violation of law or LBNL policy.

<u>Drip Trays (secondary containment):</u> Storing liquid hazardous materials in secondary containment is required by Lab policy. This minimizes the impact and spread of spills resulting from broken/leaking containers.

<u>Chemical Inventory</u>: The chemical inventory requirements were updated to clarify owners' responsibilities and what needs to be put into the Chemical Management System (CMS). These include:

Chemical Owner: The individual who is responsible for managing and tracking chemicals in the chemical inventory. This duty can be delegated, but the chemical owner is ultimately accountable.

Consumables: Items such as grinding wheels, welding rods, or solder that can be used up, dispersed or aerosolized during use.

Prepackaged Kits: Kits containing individual containers of hazardous materials. Enter only the kit name as opposed to its individual components.

Consumer Products: Items such as glass cleaner and dry erase aren't required to be entered in the CMS if they are used in the manner of a typical household user.

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Please contact Larry McLouth (<u>ldmclouth@lbl.gov</u> ext. 5286) for questions about the Chemical Hygiene and Safety Plan or Lee Aleksich (<u>LMAleksich@lbl.gov</u> ext. 2994) regarding the Chemical Management System.